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January 20, 2017

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
Clarkson S. Fisher Federal Bldg. & U.S. Courthouse  
402 E. State Street  
Trenton, New Jersey 08608

Re: *In re: Invokana (Canagliflozin) Products Liability Litigation*  
MDL No. 2750  
Master Case No. 3:16-md-2750 (BRM) (LHG)

Dear Judge Martinotti:

Pursuant to Your Honor's guidance at the last case management conference and in accordance with the Court's Initial Case Management Order [ECF No. 8] and CMO No. 1 [ECF No. 22], Interim Co-Liaison Counsel respectfully submit their recommendations for plaintiffs' leadership structure. For the convenience of the Court, we are submitting these recommendations in the form of the attached Proposed CMO No. 2 (annexed hereto as Exhibit A), which describes the proposed leadership slate and incorporates the responsibilities and obligations of the committee as set forth by Your Honor in the Initial Case Management Order.

As discussed at the last conference, in preparing this submission, we conferred with all counsel who expressed an interest in a leadership position and believe the proposed organization reflects a consensus among such counsel and includes, in multiple respects, a diverse group of attorneys. Further, the lawyers included have the requisite experience, commitment, and resources to litigate this action for the common benefit of all plaintiffs. (See Exhibit B, annexed hereto, which includes biographies of the applicants). The proposed leadership committee includes 14 attorneys and although we could not provide leadership positions to all applicants, we anticipate the formation of several subcommittees (e.g., Discovery, Law & Briefing, and Science) which will provide opportunities to contribute to the common benefit of all plaintiffs for any attorneys who wish to participate in the litigation.

Letter to the Hon. Brian R. Martinotti

January 20, 2017

Respectfully submitted,

s/ Christopher A. Seeger  
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